

THE HONORABLE MARCIA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware  
corporation, and IMDB.COM, INC., a  
Delaware corporation,

Defendants.

No. 2:11-CV- 01709-MJP

**DECLARATION OF BREENA M. ROOS  
IN SUPPORT OF IMDB.COM, INC.'S  
REPLY IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

I, Breena M. Roos, hereby declare as follows:

1. I am an attorney with Perkins Coie LLP. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached hereto as Exhibit A is a true and correct copy of IMDb.com, Inc.'s webpage regarding the film titled "Consequences," *available at* [http://www.imdb.com/title/tt0936466/?ref\\_=fn\\_al\\_tt\\_2](http://www.imdb.com/title/tt0936466/?ref_=fn_al_tt_2) (last accessed December 21, 2012).

DECLARATION OF BREENA ROOS IN SUPPORT  
OF IMDB.COM, INC.'S REPLY ISO MOTION FOR  
SUMMARY JUDGMENT (No. CV- 01709-MJP) – 1

24976-0480/LEGAL25445831.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1           3.       Attached hereto as Exhibit B is a true and correct copy of results of a search for  
2  
3 the title "Consequences" in IMDb.com, Inc.'s database, *available at*  
4  
5 <http://www.imdb.com/find?q=consequences&s=all> (last accessed December 21, 2012).  
6  
7

8           I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct.  
10  
11

12  
13  
14 DATED: December 21, 2012

By: /s/ Breena M. Roos  
Breena M. Roos

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
  
DECLARATION OF BREENA ROOS IN SUPPORT OF  
IMDB.COM, INC.'S REPLY ISO MOTION FOR  
SUMMARY JUDGMENT (No. CV- 01709-MJP) – 2

24976-0480/LEGAL25445831.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

**CERTIFICATE OF SERVICE**

I certify that on December 21, 2012, I electronically filed the foregoing DECLARATION OF BREENA ROOS with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

**Derek Alan Newman**

**Keith Scully**

**Charlotte Williams**

Newman Du Wors LLP  
1201 Third Avenue, Ste 1600  
Seattle, WA 98101

\_\_\_\_ Via hand delivery  
\_\_\_\_ Via U.S. Mail, 1st Class, Postage Prepaid  
\_\_\_\_ Via Overnight Delivery  
\_\_\_\_ Via Facsimile  
\_\_\_\_ Via Email  
X\_ Via ECF\_\_\_\_\_

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 21st day of December, 2012.

s/ Breena Roos

Charles C. Sipos, WSBA No. 32825

Breena M. Roos, WSBA No. 34501

Ashley Locke, WSBA No. 40521

**Perkins Coie LLP**

1201 Third Avenue, Suite 4800

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

E-mail: csipos@perkinscoie.com

E-mail: broos@perkinscoie.com

E-mail: alocke@perkinscoie.com

Attorneys for Defendants Amazon.com, Inc.  
and IMDb.com, Inc.

DECLARATION OF BREENA ROOS IN SUPPORT OF  
IMDB.COM, INC.'S REPLY ISO MOTION FOR  
SUMMARY JUDGMENT (No. CV- 01709-MJP) – 3

24976-0480/LEGAL25445831.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

## EXHIBIT A

[Register](#) | [Login](#) | [Help](#)

[Movies](#) | [TV](#) | [News](#) | [Trailers](#) | [Community](#) | [IMDbPro](#) | [Apps](#)

[Your Watchlist](#)

### Consequences (2006)

36 min · [Trailer](#)

**Your rating:**

**3.2** Rating: 3.2 from 96 users  
Reviews: 4 user · 7 critic

Consequences introduces us to Max, Jimmy, Norm, Nick and Jason at the age of eighteen. Friends since early childhood...  
[See full summary](#)

**Director:** [Stephen Stahl](#)  
**Writer:** [Anthony C. Hippie](#)  
**Stars:** [Ernest E. Brown](#), [Chris Cannon](#) and [Marques Chaney](#)  
[See full cast and crew](#)

[+ Watchlist](#) [Share...](#)

### Photos

[4 photos](#)

### Cast

Credited cast:

	<a href="#">Ernest E. Brown</a>	Dealer- Bar Patron
	<a href="#">Chris Cannon</a>	Norm
	<a href="#">Marques Chaney</a>	Moose
	<a href="#">Dave Cooperman</a>	Tipper
	<a href="#">Gina Maria Destra</a>	Maria
	<a href="#">Jennifer Flint</a>	Club Dancer
	<a href="#">Effie Hortis</a>	Sophia
	<a href="#">Nicholas Kattar</a>	Max
	<a href="#">Nicholas Joseph Kattar</a>	Max
	<a href="#">Evy Lutzky</a>	Cindy
	<a href="#">Melissa Marino</a>	Party Girl
	<a href="#">Paul Marron</a>	Jason
	<a href="#">Nicole Nocintino</a>	Amber
	<a href="#">Adam Ratcliffe</a>	Nick
	<a href="#">Michael Tranzilli</a>	Jimmy

[Full cast and crew](#)

### Storyline

### Quick Links:

[overview](#)

### Related Lists

[Create a list](#)

**GAY Horror & Thriller Flicks**  
a list of 333 titles by emertens created 15 Dec 2011

[See all related lists](#)

### Connect with IMDb

[IMDb on Facebook](#)

3,247,993 people like IMDb.

[Follow @imdb](#) 706K followers

### Share this Rating

Title: *Consequences* (2006)

**IMDb 3.2**

Want to share IMDb's rating on your own site? Use the HTML below.

[Show HTML](#) [View more styles](#)

### Take The Quiz!

Test your knowledge of "Consequences".

### Sponsored Links

[Watch Movies Online](#)  
Watch Full-Screen, High Res Movie Clips & Trailers - Download Free!  
FilmFanatic.MyWebSearch.com

[Watch TV Now](#)  
Instantly Watch TV Shows & Movies. Try It Free!

Consequences introduces us to Max, Jimmy, Norm, Nick and Jason at the age of eighteen. Friends since early childhood, they have bonded deeper than natural brothers. As eighteen-year-old men, we share with them their dreams, loves, and friendships as well as life's hopes and frustrations. We, once again, meet them at age forty and learn how their lives have unfolded as we experience their marriages, strengths and disappointments. Together they are capable of celebrating with each other their emotions in an open and honest fashion. The group is together now on their annual football weekend, this year in Philadelphia. While bonding and enjoying the vibrant nightlife, they become separated only to find a darkness they have never known. It becomes a struggle of life or death. The friends find themselves disconnected from each other but ultimately gain a stronger respect for one another than they ever thought possible.... Written by [Anonymous](#)

[Plot Summary](#) [Add Synopsis](#)

**Plot Keywords:** [Bare Chested Male](#) [Bare Chested Male Bondage](#) [Blood](#) [Non Statutory Female On Male Anal Rape](#) [Torture](#)

**Genres:** [Thriller](#)

**Parents Guide:** [Add content advisory for parents](#) »

## Details

[Edit](#)

**Official Sites:** [Official site](#) [Official site](#) [Add/edit official sites](#) »

**Country:** [USA](#)

**Language:** [English](#)

**Also Known As:** [Playroom](#) [See more](#) »

**Filming Locations:** [Bucks County, Pennsylvania, USA](#) [See more](#) »

## Box Office

**Budget:** \$450,000 (estimated)

[See more](#) »

## Company Credits

**Production Co:** [DIVE](#), [FIN Pictures](#), [YNOT Productions](#) [See more](#) »

Show detailed [company contact information](#) on [IMDbPro](#) »

## Frequently Asked Questions

[This FAQ is empty. Add the first question.](#)

## User Reviews

★ ★ ★ ★ ★ **Welcome to the Gay Hostel?**  
21 October 2008 | by [FrighMeter](#) (FrighMeter.Com) ~ [See all my reviews](#)

Wow. Not sure where to begin with this one. It wasn't what I was expecting, that is for certain. In fact, for about the first 45 minutes of the film, I was pondering why it was even classified as horror on Netflix, as it was about the farthest thing from horror I have seen. However, the film almost immediately shifts tone and focus about halfway through and becomes a extreme "Hostel" wannabe. Unfortunately, it is not a very good one.

The film centers on five middle-age guys who have been friends since high school. Now most are married and have kids, they all still know each other extremely well, including dirty secrets, such as infidelities and other degenerate behavior over the years. One evening, the decide to go into downtown Philadelphia for an annual football get together. Instead, two of the guys seek out women to have sex with (even though they are married). The others sit around and bitch about their unfaithful, sex-hungry pals while getting drunk. Unfortunately for the two who sought sex, they wake up chained to beds on a small, isolated room. Soon, a group of shady guys (and gals) reveal themselves and being to torture the two in very graphic and sexual ways.

The Good: Um.....some decent looking guys with hot bodies who are naked for the second half of the film to look at?

The Bad: Everything else. The whole gay element that is played up in this film is the last thing that bothered me (trust me there). It's the fact that this is a incompetently directed, poorly acted, and horribly written film. As I mentioned, the film completely shifts tone halfway through...at a point where I suspect most have stopped watching due to the sheer boringness of the first half of the film. The acting is atrocious, particularly from the guy who portrays the main villain. His screaming, tyrannical rants are cringeworthy they are so bad. The guys who are being tortured really, most of the time, act like they could care less. Characters do stupid things. Note: If your captor is actually being nice to you and helping you smoke a cigarette while explaining what you need to do to survive, it is probably NOT a good thing to shove that same cigarette into his face WHILE YOU ARE STILL CHAINED TO THE BED! Once the torture starts, it is somewhat brutal, I suppose. The two are anally raped, have their genitals mutilated, and are cut and sliced various ways. There is definitely a blatant gay undertone to this film, so if that bothers you, avoid. The ending is...well...strange for lack of a better word and really left a bad-taste in my mouth. It certainly didn't pack the punch that I suspect the filmmakers thought it would. On top of all this, the film looks cheap and amateurish and the direction is unfocused and lazy. And most of the time with these types of films, they are effective because the audience has an investment in or liking of at least one of the characters. The writer made these characters such jerks and unflattering individuals that we don't care what happens to any of them.

This is NOT an enjoyable film to watch, not because of the violence, but because of how much of a mess it is. It tries way too hard to shock toward the end and fails because everything we see, including the performances, look so unrealistic and phony that we don't buy any of what is happening in the first place.

My Grade: F

3 of 4 people found this review helpful. Was this review helpful to you? [Yes](#) [No](#)

[Review this title](#) [See all 4 user reviews](#) »

[hulu.com/plus](#)

**Start Download**  
Download Free Software: Converter Free Download!  
[www.Download.pconverter.com](#)





## Message Boards

Recent Posts

[CONSEQUENCES](#)
[tmc-12](#)
[Discuss Consequences \(2006\)](#) on the IMDb message boards \*

## Contribute to This Page

[Getting Started](#) | [Contributor Zone](#) \*

[Edit page](#)
[Write review](#)
Create a character page for:  [Create](#) \* ?

## Explore More About Consequences

### Credits

[full cast and crew](#)

### Story

[taglines](#)
[plot summary](#)
[characters](#)
[plot keywords](#)
[parents' guide](#)

### Did You Know?

[trivia](#)
[quotes](#)
[goofs](#)
[trivia credits](#)
[alternate versions](#)
[goofs by scene](#)
[anandh naidu](#)

### Details

[release dates](#)
[official sites](#)
[box office/business](#)
[company credits](#)
[filming locations](#)
[short clips & clips](#)
[soundtrack](#)

### Photos & Video

[photo gallery](#)
[trailer & stills videos](#)
[gallery](#)

### Opinion

[reviews](#)
[FAQ](#)
[user reviews](#)
[user ratings](#)
[external reviews](#)
[metacritic reviews](#)
[metacritic scores](#)
[metacritic reviews](#)

### Related Items

[recommendations](#)
[recommendations](#)

### Professional Services

[get more at IMDbPro](#)
[add posters & stills to this title](#)

### External Links

[miscellaneous](#)
[miscellaneous](#)
[miscellaneous](#)
[miscellaneous](#)

## Recently Viewed

[Manage your history](#)

[Home](#) | [Search](#) | [Site Index](#) | [In Theaters](#) | [Coming Soon](#) | [Top Movies](#) | [Watchlist](#) | [Top 250](#) | [TV](#) | [News](#) | [Video](#) | [Message Boards](#) | [Press Room](#)  
[Register](#) | [RSS](#) | [Advertising](#) | [Contact Us](#) | [Jobs](#) | [IMDbPro](#) | [IMDb Resume](#) | [Box Office Mojo](#) | [Withoutabox](#) | [LOVEFiLM](#)

IMDb Mobile: [iPhone/iPad](#) | [Android](#) | [Mobile site](#) | [Windows Phone 7](#) | IMDb Social: [Facebook](#) | [Twitter](#)

International Sites: [IMDb Germany](#) | [IMDb Italy](#) | [IMDb Spain](#) | [IMDb France](#)

Copyright © 1990-2012 IMDb.com, Inc.

[Terms of Use](#) | [Privacy Policy](#) | [Interest-Based Ads](#)

An [amazon.com](#) company.

### Amazon Affiliates

[Amazon Instant Video](#)  
Watch Movies &  
TV Online

[Prime Instant Video](#)  
Unlimited Streaming  
of Movies & TV

[Amazon Germany](#)  
Buy Movies on  
DVD & Blu-ray

[Amazon Italy](#)  
Buy Movies on  
DVD & Blu-ray

[Amazon France](#)  
Buy Movies on  
DVD & Blu-ray

[LOVEFiLM](#)  
Watch Movies  
Online

[Amazon Wireless](#)  
Cellphones &  
Wireless Plans

[Junglee](#)  
India Online  
Shopping

[DPReview](#)  
Digital  
Photography

[Audible](#)  
Download  
Audio Books

Save up to  
**75% off** at restaurants  
in your city

[Sign Up For Free](#)
[amazonlocal](#)

## EXHIBIT B



Download the free  
IMDb Android app

Movies TV People

Most-viewed titles on IMDb

Download now »

consequences
All
Register | Login | Help

Movies TV News Trailers Community IMDbPro Apps Your Watchlist

### Results for "consequences"

Jump to: Titles Keywords Companies

#### Titles

Girl, Positive (2007) (TV Movie)  
aka "Consequences"

Consequences (2006)

Consequences (2011) (TV Series)

Collateral Consequences (2010) (Video)

Lake Consequence (1993) (TV Movie)

The Consequences of Love (2004)

Truth or Consequences, N.M. (1997)

The New Truth and Consequences (1950) (TV Series)

Consequence (2003)

Little Consequences (2012) (Short)

View: [More title matches](#) or [Exact title matches](#)

#### Keywords

consequences (21 titles)

consequence (3 titles)

unintended-consequences (14 titles)

View: [More keyword matches](#) or [Exact keyword matches](#)

#### Companies

William Joiner Center for the Study of War and Social Consequences, University of Massachusetts, Boston [us]

Consequence Films [ca]

View: [More company matches](#)

FOR \$199

Available at  
play.google.com

Buy now

[Feedback](#)

#### Category Search

Search for "consequences" within a specific category:

All

Name (actor, writer, director, etc)

Title (movie, TV, video game)

Movie

TV

TV Episode

Video Game

Character

Company

Keyword

Videos

Plot Summaries

Biographies

Quotes

#### Additional Search Options

Advanced Search

Advanced Title Search

Advanced Name Search

[Log in](#) to enable adult titles/names in your searches.

#### Recently Viewed

[Manage your history](#)

[Home](#) | [Search](#) | [Site Index](#) | [In Theaters](#) | [Coming Soon](#) | [Top Movies](#) | [Watchlist](#) | [Top 250](#) | [TV](#) | [News](#) | [Videos](#) | [Message Boards](#) | [Press Room](#)

[Register](#) | [RSS](#) | [Advertising](#) | [Contact Us](#) | [Jobs](#) | [IMDbPro](#) | [IMDb Resume](#) | [Box Office Mojo](#) | [Withoutabox](#) | [LOVEFiLM](#)

IMDb Mobile: [iPhone/iPad](#) | [Android](#) | [Mobile site](#) | [Windows Phone 7](#) | IMDb Social: [Facebook](#) | [Twitter](#)

International Sites: [IMDb Germany](#) | [IMDb Italy](#) | [IMDb Spain](#) | [IMDb France](#)

Copyright © 1990-2012 IMDb.com, Inc.

[Terms of Use](#) | [Privacy Policy](#) | [Interest-Based Ads](#)

An [amazon.com](#) company.

Amazon Affiliates

[Amazon Instant Video](#) Watch Movies & TV Online

[Prime Instant Video](#) Unlimited Streaming of Movies & TV

[Amazon Germany](#) Buy Movies on DVD & Blu-ray

[Amazon Italy](#) Buy Movies on DVD & Blu-ray

[Amazon France](#) Buy Movies on DVD & Blu-ray

[LOVEFiLM](#) Watch Movies Online

[Amazon Wireless](#) Cellphones & Wireless Plans

[Jungle](#) India Online Shopping

[OPReview](#) Digital Photography

[Audible](#) Download Audio Books

